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AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
DEPUTY  
BY

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

Edward Starks and Terrye Starks

CASE NO. **23-cv-1493-RAJ**  
[to be filled in by Clerk's Office]

COMPLAINT FOR A CIVIL CASE

Jury Trial: ☐ Yes ☒ No

Plaintiff(s),

v.

The Cove Apartments  
and  
Carol Key

Defendant(s).

**I. THE PARTIES TO THIS COMPLAINT**

A. Plaintiff(s)

*Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.*

Name	Edward Starks and Terrye Starks
Street Address	1909 104th Avenue E Unit Y207
City and County	Edgewood Pierce
State and Zip Code	WA 98372
Telephone Number	(206) 349-6279

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## 1 B. Defendant(s)

2 *Provide the information below for each defendant named in the complaint, whether the*  
 3 *defendant is an individual, a government agency, an organization, or a corporation. For an*  
 4 *individual defendant, include the person's job or title (if known). Attach additional pages if*  
 5 *needed.*

## 6 Defendant No. 1

7 Name The Cove Apartments

8 Job or Title (if known)

9 Street Address

33131 First Avenue SW

10 City and County

Federal Way King

11 State and Zip Code

WA 98023

12 Telephone Number

(253) 838-7867

## 13 Defendant No. 2

14 Name

Carol Key

15 Job or Title (if known)

Landlord

16 Street Address

33131 First Avenue SW

17 City and County

Federal Way King

18 State and Zip Code

WA 98023

19 Telephone Number

(253) 838-7867

## 20 Defendant No. 3

21 Name

22 Job or Title (if known)

23 Street Address

24 City and County

State and Zip Code

Telephone Number

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Defendant No. 4

Name

Job or Title (*if known*)

Street Address

City and County

State and Zip Code

Telephone Number

## II. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (*select all that apply*)

☒ Federal question:

If checked complete section A.

☐ Diversity of citizenship:

If checked complete section B.

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States

Constitution that are at issue in this case. *Attach additional pages if needed.*

Fraud and Misrepresentation:

Landlord made false statement with the intent on misrepresentation of fact. Done with financial displacement in mind, creating an eviction. Destroying plaintiff's rental history, credit history and lease renewal.

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1 B. If the Basis for Jurisdiction Is Diversity of Citizenship

2 1. The Plaintiff(s)

3 a. If the plaintiff is an individual.

4 The plaintiff (*name*) \_\_\_\_\_, is a citizen of the  
5 State of (*name*) \_\_\_\_\_.

6 b. If the plaintiff is a corporation.

7 The plaintiff, (*name*) \_\_\_\_\_, is incorporated under  
8 the laws of the State of (*name*) \_\_\_\_\_, and has its principal  
9 place of business in the State of (*name*) \_\_\_\_\_.

10 *(If more than one plaintiff is named in the complaint, attach an additional page providing*  
11 *the same information for each additional plaintiff.)*

12 2. The Defendant(s)

13 a. If the defendant is an individual.

14 The defendant, (*name*) \_\_\_\_\_, is a citizen of the  
15 State of (*name*) \_\_\_\_\_. Or is a citizen of  
16 (*foreign nation*) \_\_\_\_\_.

17 b. If the defendant is a corporation.

18 The defendant, (*name*) \_\_\_\_\_, is incorporated under  
19 the laws of the State of (*name*) \_\_\_\_\_, and has its principal  
20 place of business in the State of (*name*) \_\_\_\_\_.

21 Or is incorporated under the laws of (*foreign nation*) \_\_\_\_\_,  
22 and has its principal place of business in (*name*) \_\_\_\_\_.

23 *(If more than one defendant is named in the complaint, attach an additional page*  
24 *providing the same information for each additional defendant.)*

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3. The Amount in Controversy.

The amount in controversy-the amount the plaintiff claims the defendant owes or the amount at stake-is more than \$75,000, not counting interest and costs of court, because (explain) Attach additional pages if needed:

### III. STATEMENT OF CLAIM

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Landlord removed EPRAP funds issued on December 27, 2022 by Well Spring. Landlord created a false statement to do. Plaintiff has signed documents via Well Spring with email confirmation. Landlord's action leaves the plaintiff with an outstanding balance for rent with eviction notices. Plaintiff under threat of eviction moved causing expenses for movers and move in expenses. As a result of the activities at the Cove Apartment, Plaintiff lost income of about 2 years. Plaintiff's source of income was destroyed.

### IV. RELIEF

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages. Attach additional pages if needed.

Plaintiff ask the court to remove all debt incurred by landlord's actions and rental and credit history be returned as was. Plaintiff ask the court that all expenses incurred with moving be paid. Plaintiff ask the court to be paid for 3 years of mental haggling, lost of income source that still remains a lost. Never a chance to recover. And violation of plaintiff's rights. Plaintiff for 4 months was showing their rent was paid via portal transaction and Yes Management company. Landlord reversed it all.

### V. CERTIFICATION AND CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper

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1 purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;  
 2 (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or  
 3 reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so  
 4 identified, will likely have evidentiary support after a reasonable opportunity for further  
 5 investigation or discovery; and (4) the complaint otherwise complies with the requirements of  
 6 Rule 11.

7 I agree to provide the Clerk's Office with any changes to my address where case-related  
 8 papers may be served. I understand that my failure to keep a current address on file with the  
 9 Clerk's Office may result in the dismissal of my case.

10 Date of signing:

September 25, 2023

11 Signature of Plaintiff

Edward Starks

12 Printed Name of Plaintiff

Edward Starks

13  
 14 Date of signing:

September 25, 2023

15 Signature of Plaintiff

Terry Starks

16 Printed Name of Plaintiff

Terry Starks

17  
 18 Date of signing:

\_\_\_\_\_

19 Signature of Plaintiff

\_\_\_\_\_

20 Printed Name of Plaintiff

\_\_\_\_\_

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